

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

IN RE: HUSSEIN MOUSSA

CHAPTER 13
HON. WALTER SHAPERO
CASE NO: 12-54346

OBJECTIONS TO CONFIRMATION

Creditor Sanaa Boumelhem, through her attorney, files the following:

1. Creditor is the ex-wife of Debtor, pursuant to attached Judgment of Divorce.
2. Pursuant to the "Alimony" paragraph, any unpaid obligation under the Judgment from this debtor to this creditor is automatically converted to alimony.
3. The plan is filed in bad faith. This debtor filed a Chapter 13 case on August 13, 2006, case number 06-52034 which was converted to Chapter 7 on May 27, 2010. A discharge was issued September 14, 2010. If the conversion date is used as the filing date for the Chapter 7, 11 USC 1328(f) makes this debtor ineligible for a discharge. Furthermore, it treats her claim as a general unsecured claim, when it is, per terms of attached Judgment, overdue non-dischargeable alimony which must be paid in full.
4. Under 11 USC 1328(a) this creditor's claim is alimony, and must be paid in full.

July 24, 2012

/s/ Kurt O'Keefe
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